

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RIDE THE DUCKS SEATTLE, LLC,

Plaintiff,

v.

RIDE THE DUCKS INTERNATIONAL,
LLC; CHRIS HERSCEND AND JANE
DOE HERSCEND, individually and on
behalf of their marital community; and
HERSCEND FAMILY
ENTERTAINMENT CORPORATION,

Defendants.

No. 2:19-cv-01408-MJP

STIPULATED MOTION TO ADJUST
EXPERT DISCLOSURE DEADLINES

NOTE ON MOTION CALENDAR:
February 27, 2020

STIPULATION

Plaintiff Ride the Ducks of Seattle, LLC (“RTDS”), by and through its counsel of record, Patricia K. Buchanan, D. Jack Guthrie, and Nicholas A. Carlson of Patterson Buchanan Fobes & Leitch, Inc., P.S., and Defendants Ride the Ducks International, LLC (“RTDI”), Chris Herschend and Jane Doe Herschend (“Herschend”) and Herschend Family Entertainment Corporation (“HFEC”) (collectively “Defendants”), by and through their counsel of record, Rodney Umberger and Tyler Hermsen of Williams Kastner, stipulate and respectfully move the Court for an order extending the deadline by which the parties must disclose expert opinions pursuant to FRCP 26(a)(2)(B). By Order of this Court (Dkt. No. 20), the deadline to disclose expert opinions is March 9, 2020. The parties jointly request that the Court extend the deadline

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1 for expert opinions under FRCP 26(a)(2)(B) to March 30, 2020, while leaving the deadline to
2 disclose the identities of the experts under FRCP 26(a)(2)(A) on March 9, 2020.

3 The parties make this request in order to most efficiently and economically litigate the
4 issues in this case. Several circumstances lead the parties to bring this request: production of
5 discovery has only recently begun and cross motions for summary judgment are currently being
6 considered by the Court. Evaluation of the recently produced discovery and the outcome of the
7 motions for summary judgment could affect the scope of the opinions to be disclosed.
8 Allowing the parties additional time to investigate discovery and the Court time to rule on the
9 parties' motions for summary judgment would promote efficient discovery and litigation of the
10 issues at bar and avoid incurring the cost of potentially unnecessary expert opinions.

11 AGREED AND STIPULATED TO on this 27th day of February, 2020.

12 PATTERSON BUCHANAN
13 FOBES & LEITCH, INC., P.S.

14 By: s/D. Jack Guthrie
15 Patricia K. Buchanan, WSBA 19892
16 D. Jack Guthrie, WSBA 46404
17 Nicolas A. Carlson, WSBA 48311
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20 WILLIAMS KASTNER & GIBBS PLLC

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1 **ORDER**

2 THIS CAUSE CAME TO BE HEARD upon the Stipulation of the parties, by and
3 through their respective attorneys of record, seeking to continue the deadline to disclose expert
4 opinions pursuant to FRCP 26(a)(2)(B) from March 9, 2020 to March 30, 2020. The Court
5 finds good cause for extending this deadline and thus the stipulated motion is hereby
6 GRANTED. The deadline to disclose expert opinions pursuant to FRCP 26(a)(2)(B) is
7 March 30, 2020. The deadline to disclose expert identities pursuant to FRCP 26(a)(2)(A)
8 remains March 9, 2020.

9 IT IS SO ORDERED AND ADJUDGED on this __27th__ day of February, 2020.

10
11 

12 Marsha J. Pechman
13 United States Senior District Judge
14
15

16 Presented by:

17 PATTERSON BUCHANAN
18 FOBES & LEITCH, INC., P.S.

19 By: s/D. Jack Guthrie

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